To Whom It May Concern:

The Montana Department of Environmental Quality (DEQ) has prepared the following environmental assessment as required by law in ARM 17.4.607(2) and ARM 17.4.609(2). This project involves installing (1) 30,000 gallon split compartment (20K/10K) Xerxes brine-filled double wall underground storage tank storing gasoline and diesel fuels with associated secondarily contained fiberglass reinforced plastic underground piping at an existing Town Pump gasoline retail facility known as Town Pump Inc. Missoula #1, 5310 Grant Creek Rd, Missoula, MT.

The DEQ prepares environmental assessments to inform interested government agencies, public groups, or individuals of a proposed action and to determine whether or not the action may have a significant effect on the human or natural environment. This environmental assessment will be circulated for seven days. After the seven-day comment period, DEQ will decide what action to take regarding this permit.

If you care to comment on this proposed project or the attached environmental assessment, please write or email the Permitting & Compliance Division. Comments must be in writing and must be received by August 1, 2008. Our email address is ustprogram@mt.gov and our mailing address is P.O. Box 200901, Helena, MT, 59620-0901.

Sincerely,

Redge R. Meierhenry Environmental Engineer Waste and Underground Tank Management Bureau

enc: Environmental Assessment

O/O NAME: Big Sky Progress, LLC	FACILITY NO: 32-13336
PERMIT NO: 09-0006	DATE OF APPLICATION: July 11, 2008
PERSON PREPARING EA: Redge R. Meierhenry	COUNTY: Missoula
LOCATION: 5310 Grant Creek Rd, Missoula, MT	
FACILITY NAME: Town Pump Inc Missoula #1	EA COMPLETED: July 14, 2008

DESCRIPTION OF PROPOSED ACTION: The proposed scope of work is to install (1) 30,000 gallon(two compartment split $20\mathrm{K}/10\mathrm{K}$) Xerxes double-wall brine-filled fiberglass underground storage tank with associated underground fiberglass reinforced plastic double wall product piping and 2 inch diameter fiberglass vent piping. Each tank will use secondary containment monitoring for leak detection. Pipe leak detection will be secondary containment monitoring.

DESCRIPTION OF THE BENEFITS AND PURPOSE OF THE PROPOSED ACTION: Purpose is to install new tanks and piping at an existing refueling site adjacent to Interstate 90 exit. The benefits include more fuel choices.

- A: Significant unavoidable impacts
 B: Potential significant impacts mi
- B: Potential significant impacts mitigated based upon license conditions
- C: Insignificant as proposed

						POTENTIAL IMPACTS
	A	В	С	LONG TERM	SHORT TERM	AMPLIFICATION
PHYSICAL ENVIRONMENT		-				
1. TOPOGRAPHY: Are there unusual geologic features? Will the surface features be changed?			X			Location is currently an asphalt paved parking lot of semi-level grade adjacent to existing Town Pump Inc Missoula #1 retail fueling facility. There are no known or reported unusual geologic features. Tanks and associated piping will be buried underground while appurtenant equipment is above ground. General topography will not substantially change and surface features will be constructed consistent with retail petroleum refueling facility.
2. GEOLOGY AND SOIL QUALITY, STABILITY AND MOISTURE: Are fragile, compactible or unstable soils present? Are there special reclamation considerations?			X			There are no known special reclamation considerations for the project site nor are any fragile or unstable soils identified impacted by this proposal. Project location is currently a paved parking lot.
3. WATER QUALITY, QUANTITY AND DISTRIBUTION: Are important surface or groundwater resources present? Is there potential for violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water		Х				Important water resources are present. There is City of Missoula public water supply distribution system, public sewer system and Grant Creek adjacent to the proposed site. Seasonal high water table is reported to be

							POTENTIAL IMPACTS
		A	В	С	LONG TERM	SHORT TERM	AMPLIFICATION
	quality?						approximately 15 feet. Potential violation of ambient water quality standards, drinking water maximum contaminant levels, or degradation of water quality is mitigated by installation of double wall brine-filled fiberglass tanks (non- corroding) and secondarily contained fiberglass underground piping. Improper operation of this system would increase the potential for violation of ambient water quality standards, drinking water maximum contaminant levels, and the degradation of water quality. Leak detection systems serve to mitigate the potential impacts immediately reducing the amount of fuel available for release to the environment.
4.	AIR QUALITY: Will pollutants or particulate be produced? Is the project influenced by air quality regulations or zones (Class I airshed)? DEMANDS ON ENVIRONMENTAL RE-			X			Petroleum vapors will be released at this site; however Stage I vapor recovery will be installed to reduce vapor releases. Natural air currents and vent pipes will dissipate hydrocarbon vapors to a safe level. Welcome Creek, Selway-Bitterroot and Rattlesnake Class I area airshed is nearby but is more than 5 miles from the project site. This project will not use
	SOURCES OF LAND, WATER, AIR OR ENERGY: Will the project use resources that are limited in the area? Are there other activities nearby that will affect the project?						existing environmental resources in the local area. There is no other nearby activities identified to the reviewer that may be impacted.

						POTENTIAL IMPACTS
	А	В	С	LONG TERM	SHORT TERM	AMPLIFICATION
6. IMPACTS ON OTHER ENVIRONMENTAL RESOURCES: Are there other studies, plans or projects on this tract?			Х			There are no known other environmental studies, plans or projects on this land parcel and it is not expected that this project would impact other environmental resources on this tract.
7. TERRESTRIAL, AVIAN, AND AQUATIC LIFE AND HABITATS: Is there substantial use of the area by important wildlife, birds or fish?			Х			No known use of project site by important wildlife, birds or fish have been identified to the reviewer.
8. VEGETATION COVER, QUANTITY AND QUALITY: Will vegetative communities be permanently altered? Are any rare plants or cover types present?			Х			A portion of the existing vegetative community may be altered at the tanks/pipe burial locations on the north side of this project. However, no rare plants or cover types are reported to this reviewer.
9. UNIQUE, ENDANGERED, FRAGILE OR LIMITED ENVIRONMENTAL RESOURCES: Are any federally listed threatened or endangered species or identified habitat present? Any wetlands? Any species of special concern?			X			No federally listed threatened or endangered species, identified habitat, or species of special concern is identified or reported to the reviewer adjacent to the project site. However, various threatened and endangered species identified by the USFWS may be present within the Welcome Creek, Selway-Bitterroot and Rattlesnake Wilderness Areas located more than 5 miles from project site. There are no Lacustrine, Riverine, Paulustrine wetlands identified by the reviewer within .5 miles of project location.
10. HISTORICAL AND ARCHEOLOGICAL SITE: Are any historical, archeological or paleontological resources present?			X			There are (61) listed historical structures located within the City of Missoula. However, it is not expected that the project will have any significant impact on these facilities. There are no known archeological or paleontological resources reported to the reviewer.

						POTENTIAL IMPACTS
	A	В	С	LONG	SHORT	
				TERM	TERM	
11. AESTHETICS: Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?			х			This proposal is aesthetically compatible with the land use of the area adjacent to the project site. Storage tank equipment will be buried underground with appurtenant equipment above ground that will be visible but in keeping with the existing character of the area that is commercially developed adjacent to Interstate 90 traffic exit.
12. <u>AGRICULTURE:</u> Will grazing lands, irrigation waters or crop production be affected?			X			No known impacts. No agricultural lands are presently in use at project site.
HUMAN ENVIRONMENT						
1. SOCIAL STRUCTURES AND MORES: Is some disruption of native or traditional lifestyles or communities possible?			X			It is not anticipated that the project will disrupt native or traditional lifestyles or communities.
2. <u>CULTURAL UNIQUENESS AND</u> <u>DIVERSITY:</u> Will the action cause a shift in some unique quality of the area?			X			It is not anticipated that the project will cause a shift in any unique quality of the area.
3. <u>DENSITY AND DISTRIBUTION OF</u> <u>POPULATION AND HOUSING:</u> Will the project add to the population and require additional housing?			X			It is not anticipated that the project will add to the population or require additional housing.
4. HUMAN HEALTH & SAFETY: Will this project add to health and safety risks in the area?		X				It is anticipated that natural air currents and tank vents will dissipate the hydrocarbon vapors to a safe level and the use of Stage I vent control features. Leak detection equipment is designed to detect releases before serious health or safety problems occur. Improper operation of this system could impact human health and safety. Leak detection systems and operating requirements mitigate this potential

						POTENTIAL IMPACTS
		A	В	С	LONG TERM	
						impact by immediately reducing the amount of fuel available to be released into the environment where it could impact health and human safety.
5.	COMMUNITY & PERSONAL INCOME: Will the facility generate or degrade income?			X		The project result (retail of fuel) is reported to the reviewer to not have any potential to generate community or personal income in the local area.
6.	QUANTITY AND DISTRIBUTION OF EMPLOYMENT: Will the project create, move or eliminate jobs? If so, estimate jobs.			X		It is not anticipated that this project will create or eliminate jobs. The project result (retail of fuel) is also reported to the reviewer to not have any potential to create any new local jobs associated with the retail of fuel.
7.	LOCAL AND STATE TAX BASE REVENUES: Will the project create or eliminate tax revenue?			X		It is not anticipated that this project will add to the local or state tax base. However, it is anticipated that the fueling operation associated with this proposal may generate additional local and state tax revenue.
8.	DEMAND FOR GOVERNMENT SERVICES: Will substantial traffic be added to existing roads? Will other services (fire protection, police, schools, etc.) be needed?			Х		It is anticipated that the result of the proposed project will not add significantly to the local traffic flow along Grant Creek Rd adjacent to the I-90 freeway exit. Other required services will be minimally impacted as a result of this project.

						POTENTIAL IMPACTS
	А	В	С	LONG TERM	SHORT TERM	
9. INDUSTRIAL, COMMERCIAL AND AGRICULTURAL ACTIVITIES AND PRODUCTION: Will the project add to or alter these activities?			X			No significant impacts are anticipated that are related to this project.
10. ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES: Are wilderness or recreational areas nearby or accessed through this tract? Is there recreational potential within the tract?			X			Recreational and wilderness areas are accessed through the project location. However, it is not anticipated that this project or the result of this project will affect this access route.
11. AESTHETICS: Is the project on a prominent topographical feature? Will it be visible from populated or scenic areas? Will there be excessive noise, light or odors?			Х			Petroleum storage tank and piping are buried underground. It is not anticipated that this project will change the aesthetics of the area that is currently commercial in nature.
12. LOCALLY ADOPTED ENVIRONMENTAL PLANS AND GOALS: Are there state, county, city, USFS, BLM, tribal, etc., zoning or management plans in effect?		Х				There is no known tribal, USFS or BLM environmental management plans that would impact this project development. The project will be affected by the Missoula Water Quality District and the facility is required to conform to the district's requirements. The proposed project and associated development is expected to be conformance with current City of Missoula zoning requirements (application submitted to the city).
13. TRANSPORTATION: Will the project affect local transportation networks and traffic flow?			х			This project is expected to minimally affect immediately adjacent local transportation network because this is an existing fueling facility and is adjacent to I-90 freeway traffic exit. However, the local transportation network appears designed to accommodate this and other proposed commercial development.

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<u>PUBLIC INVOLVEMENT:</u> The department has attempted to identify interested parties to this application and provide the opportunity for public comment. A copy of this Environmental Assessment of the proposed underground storage tank installation has also been posted at our website (http://www.deq.state.mt.us/ea.asp). Substantive comment may also be provided to email address at ustprogram@mt.gov

ALTERNATIVES CONSIDERED: No other alternatives were presented or considered.

<u>COMPLIANCE STATUS:</u> This project, as permitted, will be in compliance with the UST regulations. The facility must, however, be operated and maintained in accordance with the UST rules and regulations. This facility is required to have a compliance inspection done within 120 days of the installation of the tank systems.

<u>RECOMMENDATIONS CONCERNING PREPARATION OF AN EIS:</u> Not necessary at this time based upon the information reviewed. The project, as proposed with mandatory operating and permit conditions, will not have a significant environmental impact.

OTHER GROUPS OR AGENCIES CONTACTED OR WHICH MAY HAVE OVERLAPPING JURISDICTION: The Montana Department of Justice, Fire Prevention and Investigation Bureau regulates aboveground components.

 $\overline{\text{INDIVIDUALS OR GROUPS CONTRIBUTING TO THIS EA:}}$ The owner, the contractor, and the preparer of the EA.

<u>PERMIT CONDITION EFFECTS:</u> Permit conditions are based on Montana and federal regulations, PEI RP100-2000 and accepted standard engineering practices.

cc: Governor's Office Legislative Environmental Policy Office

